

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FILED

APR 23 2018

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

TERRANCE WILSON,  
a/k/a "Mutt,"

Defendant.

No. S2-4:15CR441 CDP (NCC)

Counts I-II

**SUPERSEDING INFORMATION**

**COUNT I**

The United States of America charges that:

Beginning on a date unknown, but including in or about June 2007, and continuing up to the date of this Superseding Information, within the Eastern District of Missouri, and elsewhere,

**TERRANCE WILSON, a/k/a "Mutt,"**

the defendant herein, did knowingly and intentionally conspire, combine, confederate and agree, with other persons, both known and unknown to the United States, including Conspirator One, to commit offenses against the United States, to wit: (1) to knowingly and intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance drug; (2) to knowingly and intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance drug; and (3) to knowingly and intentionally distribute and possess with the intent to distribute marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 846 and 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C) and (D).

**MANNER AND MEANS**

1. Conspirator One was a St. Louis-based cocaine and heroin distributor, who obtained distribution quantities of cocaine, heroin, and marijuana, by various means, which he then distributed to others in exchange for United States currency within the Eastern District of Missouri.
2. Conspirator One enlisted sources of supply to obtain cocaine, heroin, and marijuana through means routinely utilized by illegal drug traffickers, such as the development of traditional relationships with source(s) of supply in which Conspirator One, or his associates, delivered United States currency to the source(s) of supply in exchange for illegal controlled substances, including cocaine, heroin, and marijuana.
3. Conspirator One also engaged in drug-trafficking robberies and/or dealings with other drug traffickers in which Conspirator One and his associates would rob other drug traffickers of controlled substances and United States currency.
4. On some occasions, Conspirator One entered into drug trafficking agreements, accepted United States currency, but did not deliver an illegal controlled substance in exchange for the United States currency as previously agreed upon by Conspirator One.
5. Conspirator One routinely enlisted other persons to perform acts of violence in furtherance of and in relation to drug-trafficking activities.
6. Conspirator One maintained relationships with a number of associates, including **TERRANCE WILSON, a/k/a "Mutt,"** and others, who acted in furtherance of Conspirator One's

drug-trafficking activities, including by engaging in violent acts in furtherance of said drug-trafficking activities.

7. **TERRANCE WILSON, a/k/a "Mutt,"** and others, acted as enforcers and shooters for Conspirator One and his associates.

8. **TERRANCE WILSON, a/k/a "Mutt,"** and others, routinely received consideration, specifically United States currency and other items of value from Conspirator One and his associates for engaging in acts of violence related to illegal drug-trafficking crimes.

## **COUNT II**

The United States of America further charges that:

Between July 28, 2009, and October 27, 2010, in St. Louis City, Missouri, within the Eastern District of Missouri, and elsewhere,

**TERRANCE WILSON, a/k/a "Mutt,"**

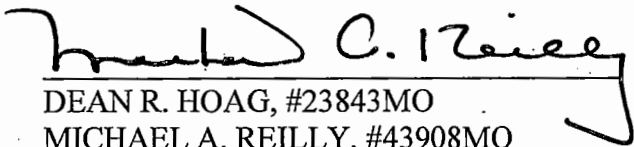
the defendant herein, aiding and abetting and acting with others, known and unknown to the United States, including Conspirator One, did knowingly possess one or more firearms in furtherance of the commission of a drug-trafficking crime which may be prosecuted in a court of the United States, to-wit: Conspiracy to distribute and to possess with the intent to distribute controlled substances as charged in Count I herein, and in the course of such violation, caused the deaths of (a) Ronald James; (b) Michael McGill; and (c) Darrion Williams, Jr., through the use of one or more firearms.

In violation of Title 18, United States Code, Sections 2, 924(c)(1)(A), and 924(j).

And in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendant, aiding and abetting and acting with others, with malice aforethought, unlawfully killed (a) Ronald James on or about July 28, 2009; (b) Michael McGill on or about March 26, 2010; and (c) Darrion Williams, Jr., by shooting him on or about July 23, 2010, thereby causing his death on or about October 27, 2010; defendant, aiding and abetting and acting with others, caused each death by shooting each victim with one or more firearms, willfully, deliberately, maliciously, and with premeditation, thereby making this offense punishable under Title 18, United States Code, Sections 2 and 924(j).

Respectfully submitted,

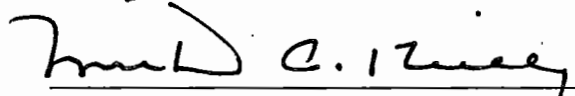
JEFFREY B. JENSEN  
United States Attorney

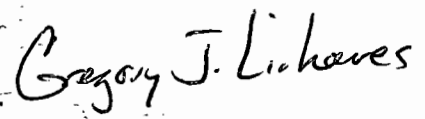


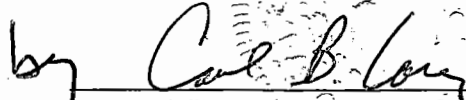

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UNITED STATES OF AMERICA     )  
EASTERN DIVISION                )  
EASTERN DISTRICT OF MISSOURI    )

I, Michael A. Reilly, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing Superseding Information is true as I verily believe.

  
MICHAEL A. REILLY, #43908MO  
Assistant United States Attorney

Subscribed and sworn to before me this 23<sup>rd</sup> day of April, 2018. 

by   
CLERK, U.S. DISTRICT COURT  
  
Deputy Clerk

By: \_\_\_\_\_  
DEPUTY CLERK